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Operable Unit No. 1 (881 Hillside) CMS/FS and Class III Groundwater

Sue Stiger, Associate General Manager Environmental Restoration Management EG&G Rocky Flats, Inc.

You should be pursuing designation of Class III groundwater for the Operable Unit (OU) No. 1 (881 Hillside) Corrective Measures Study/Feasibility Study Report (CMS/FS). The National Contingency Plan (page 8732, Federal Register, Vol. 55, No. 46, Thursday March 8, 1990) states:

For Class III ground water ... that does not have the potential to affect drinkable or environmentally significant ground water, drinking water standards are not ARAR and will not be used to determine preliminary remediation goals. ... The beneficial use of the ground water (e.g., agricultural or industrial use), if any, is determined; and the remediation approach will be tailored for returning the ground water to that designated use. ... In general, alternatives for Class III ground waters will be relatively limited and the focus may be, for example, on preventing adverse spread of the significant contamination or source control prevent exposure to ... contamination.

This is a significant change in approach for OU 1 that would potentially resolve the issue surrounding the <u>limited volume of water</u> available at OU 1. There is Environmental Protection Agency guidance that defines "Class III" groundwater by volume (i.e. if there is less than 150 gallons per day). You are directed to pursue classification of OU 1 groundwater as Class III and incorporate in the preparation of the Draft CMS/FS.

If you have any questions, please contact Scott Grace at extension 7199.

CORRES CONTROL X X
ADMN RECORD/080
PATS/T130G

Jessie Roberson

Acting Assistant Manager for Environmental Restoration

Reviewed for Addresses Corres. Control RFP

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